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MEMO ENDORSED

1/19/21

OK

*Colleen McMahon*

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

BY ECF

Re: United States v. James Cahill  
20 Cr. 521 (CM)

Dear Judge McMahon:

October 20, 2020, the Court granted defendant James Cahill's ("Cahill") motion to travel to certain stores in order to shop for his household. By this letter, Cahill respectfully requests that he be permitted to travel to two additional stores; Target located at 50 Spring Valley Market Place in Spring Valley NY, and Wegmans located at 100 Farm Avenue in Montvale, NJ. Travel to these stores, if permitted, will be subject to the same restrictions, necessity for prior Pretrial Services ("PTS") approval and production of receipts requirements that apply to all other shopping trips. The government, by Assistant United States Attorney Danielle Sassoon, defer to PTS on this application and PTS, by United States Pretrial Services Officer Winter Pascual, consents.

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Sanford Talkin*  
Sanford Talkin

cc: AUSA Jason Swergold  
AUSA Jun Xiang  
SAUSA Laura de Oliveira  
USPTO Winter Pascual (by email)

